

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARDS-WILCOX, INC.

Plaintiff,

v.

DATUM FILING SYSTEMS, INC.,

Defendant.

CIVIL ACTION NO.

08cv1509

FILED: 03/13/08 AEE

JUDGE DER-YEGHIAYAN

MAG. JUDGE VALDEZ

**COMPLAINT
AND
DEMAND FOR JURY TRIAL**

Plaintiff Richards-Wilcox, Inc. ("Richards-Wilcox"), as and for its complaint against defendant Datum Filing Systems, Inc. ("Datum") states:

NATURE OF THE DISPUTE

1. This is a case for patent infringement in violation of United States law.
2. Plaintiff Richards-Wilcox is the owner of U. S. Patent 6,105,513 titled "SHELVING BASE METHOD AND SYSTEM", issued August 22, 2000 (hereinafter " '513 patent"), a copy of which is attached hereto as Exhibit 1.
3. Plaintiff Richards-Wilcox manufactures and sells four post shelving with Quik-Base™ (hereinafter "four post shelving with Quik-Base") pursuant to the '513 patent.
4. Defendant Datum makes or has made, offers for sale, and sells in the United States Four Post Shelving with 2" Combo Base (hereinafter "Four Post Shelving with 2" Combo

Base"), shown in literature attached hereto as Exhibit 2, in competition with the four post shelving with Quik-Base of Richards-Wilcox.

JURISDICTION AND VENUE

5. Richards-Wilcox is a corporation organized and existing under the laws of the State of Illinois, and having its principal place of business and headquarters at 600 South Lake Street, Aurora, Illinois 60506.

6. Datum is a corporation organized and existing under the laws of the State of New York and having a place of business at 89 Church Road, Emigsville, Pennsylvania 17318-0355, and has a sales representative, Ulett & Associates, Inc., having a place of business at 236 Howard Avenue, Des Plaines, Illinois 60018-1906.

7. Upon information and belief sales and offers for sale are being made in the Northern District of Illinois.

8. This is an action for patent infringement under the patent laws of the United States.

9. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331 and 1338(a).

10. Venue is proper in this District under 28 U.S.C. §§1391(b) and (c), and 1400(b).

COUNT I

DEFENDANT DATUM'S INFRINGEMENT OF THE '513 PATENT

11. Richards-Wilcox is the owner by assignment of the '513 patent, which was duly and lawfully issued by the United States Patent and Trademark Office on August 22, 2000. The '513 patent remains valid and unexpired.

12. The Datum Four Post Shelving with 2" Combo Base infringes one or more patent claims of the '513 patent.

13. On March 13, 2008, Richards-Wilcox, through its attorney, notified Datum of the infringement by express mail letter and telefax, attached hereto as Exhibit 3, of the infringement of the '513 patent by the Datum Four Post Shelving with 2" Combo Base.

14. On information and belief, Datum's continuing infringement of the '513 patent is willful and in knowing disregard of Richards-Wilcox' patent rights.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for trial by jury of all matters raised in this cause that are triable by jury, and for entry of judgment in their favor against Defendant, and requests that:

A. Defendant be preliminarily and permanently enjoined, and those in active concert or participation with it, from making, having made, using, selling, offering for sale, or importing Four Post Shelving with 2" Combo Base which infringes the '513 patent;

B. Awarding to Plaintiff damages resulting from Defendant's infringement of the '513 patent in an amount adequate to compensate Plaintiff for Defendant's infringement pursuant to 35 U.S.C. §284, and further including treble damages pursuant to 35 U.S.C. §284;

C. Awarding to Plaintiff its reasonable attorney fees and costs for infringement of the '513 patent pursuant to 35 U.S.C. §285;

D. Such other and further relief as the Court deems just and appropriate.

Dated: March 13, 2008



Brett A. Valiquet
Richard J. Hoskins
SCHIFF HARDIN LLP
233 South Wacker Drive
6600 Sears Tower
Chicago, Illinois 60606
(312) 258-5786
Attorneys for Plaintiff

EXHIBIT LIST

EXHIBIT 1.....U.S. Patent 6,105,513

EXHIBIT 2.....Four Post Shelving with 2” Combo Base Literature and Photos

EXHIBIT 3.....March 13, 2008 Letter to Datum

EXHIBIT 1



US006105513A

United States Patent [19][11] **Patent Number:** **6,105,513****Mittag**[45] **Date of Patent:** **Aug. 22, 2000**[54] **SHELVING BASE METHOD AND SYSTEM**

2415441 9/1979 France 211/186

[75] Inventor: **Douglas C. Mittag**, Bolingbrook, Ill.*Primary Examiner*—Jose V. Chen[73] Assignee: **Richards-Wilcox, Inc.**, Aurora, Ill.*Attorney, Agent, or Firm*—Hill & Simpson[21] Appl. No.: **09/309,874**[57] **ABSTRACT**[22] Filed: **May 11, 1999**[51] **Int. Cl.**⁷ **A47B 9/00**[52] **U.S. Cl.** **108/107**; 108/106[58] **Field of Search** 108/107, 106,
108/180, 192, 193, 153.1, 144.11, 147.11,
147.12; 211/166; 312/357, 265.2[56] **References Cited****U.S. PATENT DOCUMENTS**

2,802,575	8/1957	Harrison	108/106
3,050,194	8/1962	Sinninger	108/106
3,411,634	11/1968	Pesce	211/186 X
4,034,683	7/1977	DiCenzo	108/107
4,949,648	8/1990	Miller	108/107

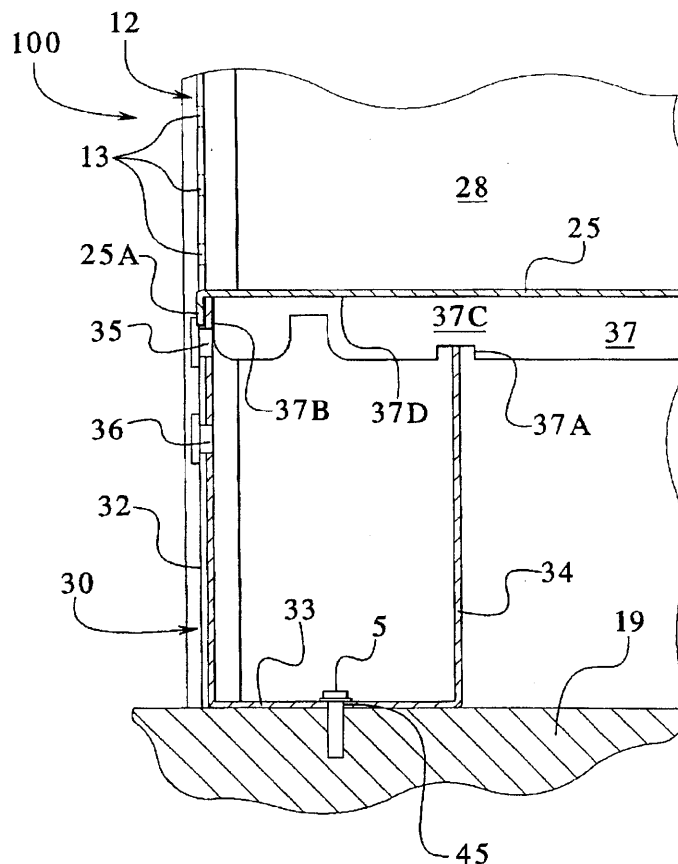
FOREIGN PATENT DOCUMENTS

1024102 1/1978 Canada 211/186

24 Claims, 4 Drawing Sheets

ALL-STATE LEGAL®
EXHIBIT
1

A shelving unit apparatus and method comprises vertical posts arranged at corners of a rectangle. A plurality of shelves are vertically spaced from one another and supported by the posts. At a front of the shelving unit, a channel-shaped base rests on a floor on which the shelving unit rests, the base being attached to the front two posts at ends of the base by projecting head rivets received in keyhole-shaped slots in the front two posts. At least one aperture in the base portion of the base receives a mounting bolt to be anchored to the floor. The bottom shelf has its front end resting on an upper edge of the front vertical wall of the base. A rear of the bottom shelf is supported by a shelf holding element attached to the two posts at the rear of the shelving unit.



U.S. Patent

Aug. 22, 2000

Sheet 2 of 4

6,105,513

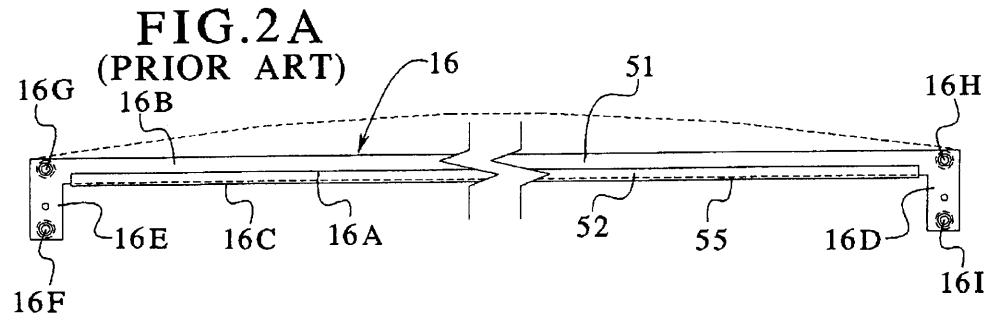


FIG. 2B
(PRIOR ART)

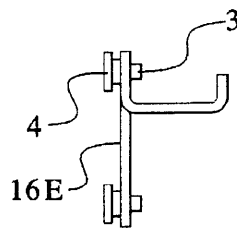


FIG. 4

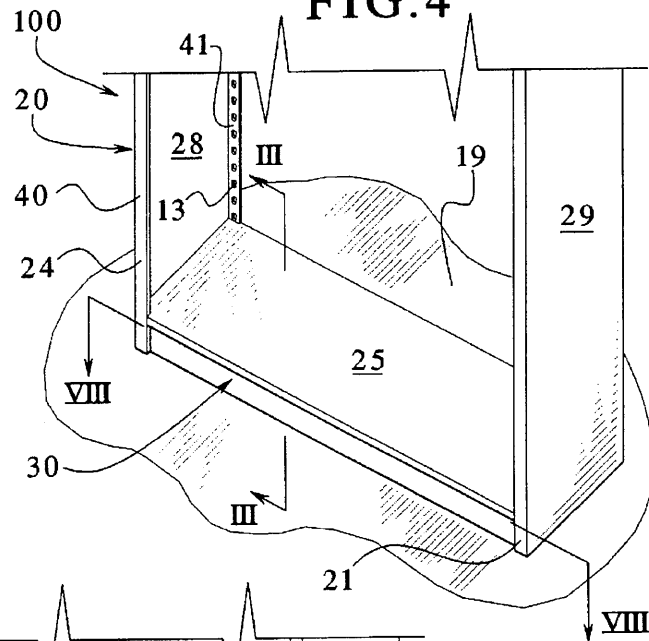


FIG. 5

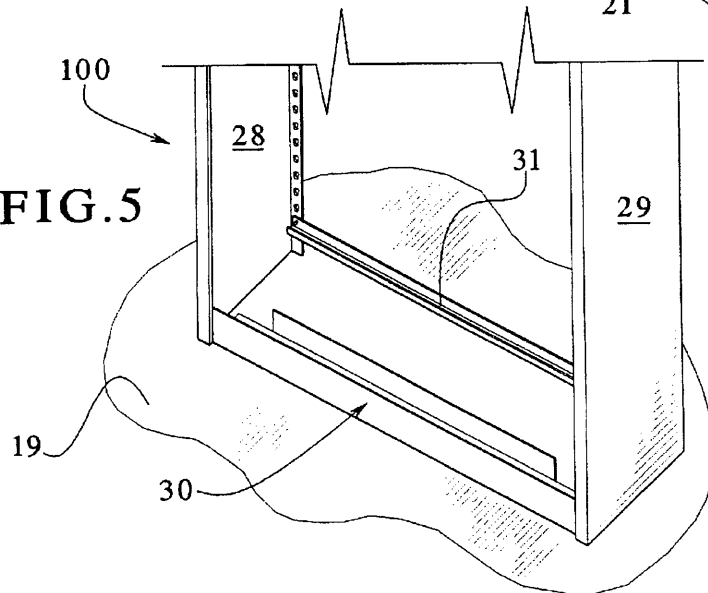


FIG. 6

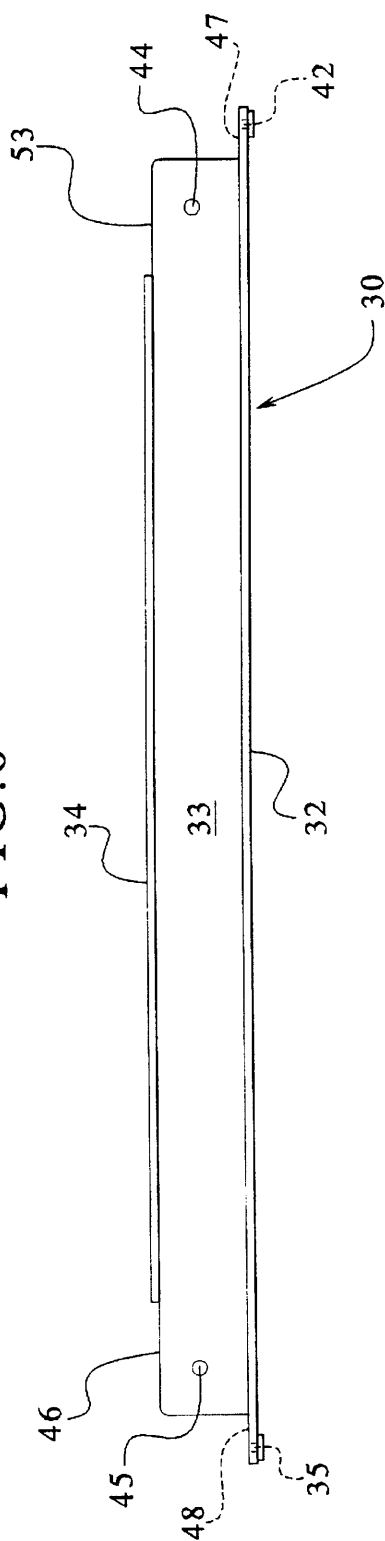


FIG. 7

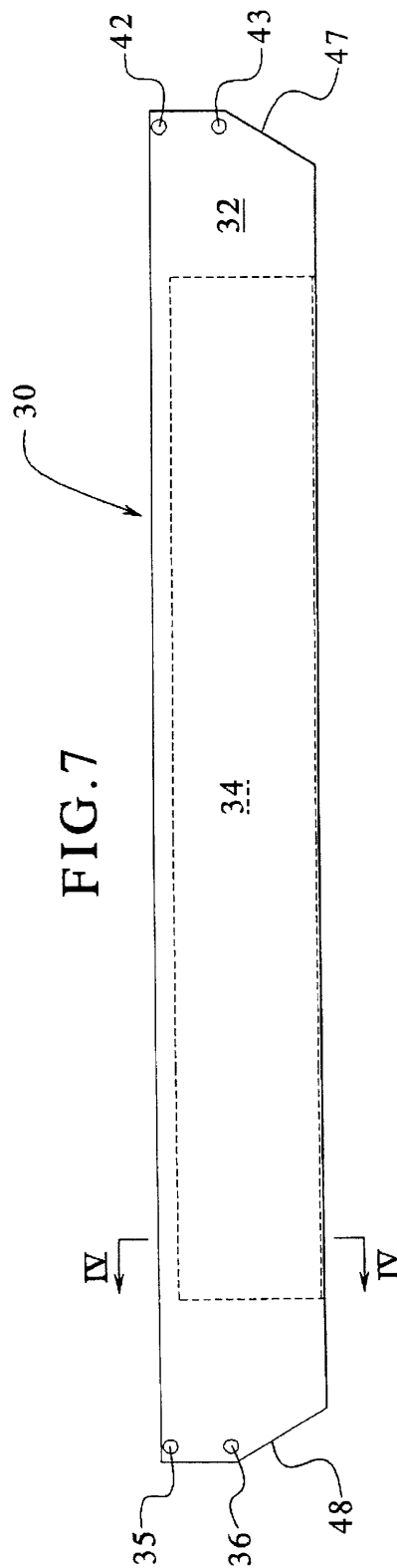
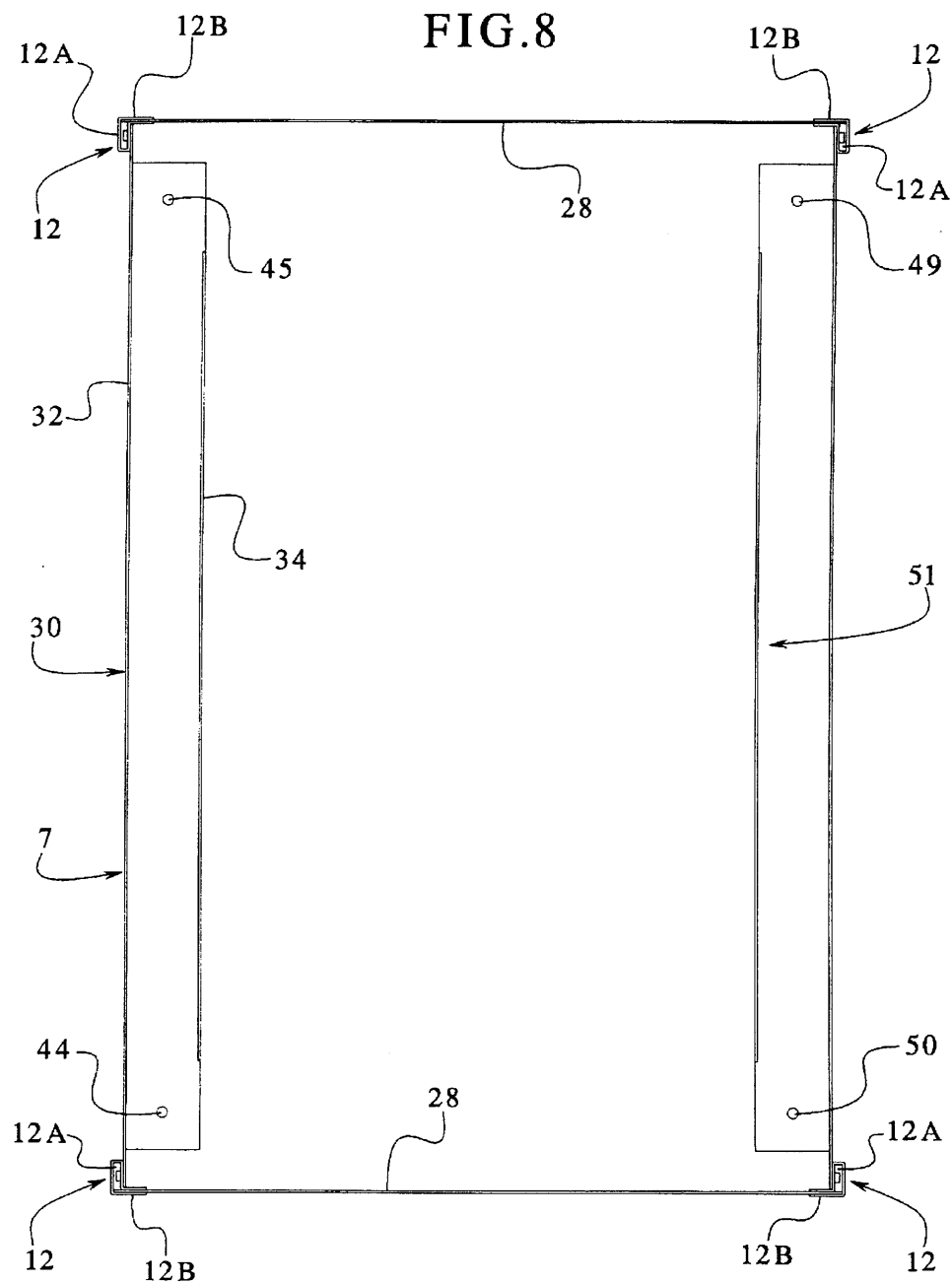


FIG.8



6,105,513

1

SHELVING BASE METHOD AND SYSTEM**BACKGROUND OF THE INVENTION**

As shown in FIG. 1 illustrating a prior art shelving base system, a shelving unit 10 is bolted by a plurality of bolts 5 to a floor 19. The side of the shelving unit has a panel 8 running from top to bottom which has a right angle bent-over flange 9 at the base thereof cut short of the corners. In an aperture 6, the bolt 5 attaches the flange 9 to the floor 19.

As is known in the prior art, four vertical posts 12 are provided at the four corners of the shelf. These posts 12, as more clearly shown in FIG. 8, have a closed channel 12A facing the front and the back of the shelving unit and a flange 12B at the sides where the side panels 8 of FIG. 1 attach. In the closed channel portion 12A slots 13 which are keyhole shaped in known prior art fashion are provided for receiving shelf supports 16 which in turn support shelves 14 having a front lip 14A. Shelf supports 16 are formed in known prior art fashion as shown in FIGS. 2A and 2B in the side view and end view respectively, and in FIG. 1 also in an end view. The shelf supports have a base portion 16C, a short lip vertical wall 16A, and a longer vertical wall 16B. As illustrated in FIG. 2A, there are mounting ears 16D and 16E at each end with each of the mounting ears having projecting rivets 16F, 16G, 16H, and 16I with each of the projecting rivets having a projecting head portion 4 such as shown in the end view of FIG. 2B and a tail portion 3 where they mount in respective apertures in the ears 16D and 16E of the supports.

Referring again to FIG. 1, a front kick plate or base plate 15 having a bottom bent-over edge 15A at right angles is provided at the front and at the back of the shelving unit. This base plate 15 at its upper end 15B slips in a space between the vertical wall 16B of the shelf support 16 and the overhang lip 14A of the shelf 14.

With this prior art unit, if a user of the shelving unit accidentally kicks the base plate 15 it can be easily bent in. It is difficult to repair this bent plate since the shelf 14 must be removed and it must be re-formed. Typically, such base plates are formed of thin steel sheeting, such as 24 gauge.

If desired, an additional reinforcement channel 18 may be provided having a U-shape with sidewalls 18A and a base portion 18B on which the shelf 14 rests. A notch 18C is provided in each sidewall 18A to receive the short vertical wall 16A of the shelf support 16. The front end 18D of the reinforcement channel 18 abuts against an inner surface of the vertical wall 16B of the shelf support 16.

SUMMARY OF THE INVENTION

It is an object of the present invention to solve the problem of bent base plates in the prior art shelving units.

It is a further object of the invention to lower cost, reduce damage in shipment, simplify assembly, and improve the overall strength of the shelving unit by an improved mounting base system.

It is a further object of the invention to strengthen the overall shelving unit relative to tipping thereof.

According to the present invention, a shelving unit is provided having four vertical posts arranged at corners of a rectangle with two of the posts being at a front of the shelving unit. At the front of the shelving unit, a base rests on a floor on which the shelving unit rests, said base being attached to the front two posts at ends of the base by connecting elements mounted to a front vertical wall of the base and received in apertures in the front two posts. At least

2

one aperture in a base portion of the base receives a mounting bolt to be anchored to the floor. A bottom shelf has its front end resting on an upper edge of said front vertical wall of the base. A rear of the bottom shelf is supported by a shelf holding element attached to the two posts at the rear of the shelving unit.

In a method of the invention for supporting a shelving unit on a floor, corner vertical posts are provided at corners of a rectangle. A base is provided having projecting mounting elements. The base is mounted to two of the corner posts at the front of the shelving unit by placing the mounting elements in apertures in the corner posts so that after the base is in position, a floor portion of the base having at least one mounting hole rests on the floor supporting the shelving unit. A shelf holding element is placed in connected position at two rear posts of the shelving unit. A bolt is placed through the mounting hole in the floor portion into the floor to mount the base of the shelving unit to the floor. A bottom shelf is then placed so that a front of the shelf rests on an upper edge of a front vertical wall of the base and with a rear of the shelf resting on the shelf holding element at the rear posts.

With the present invention, there are the following advantages.

First, the improved base of the invention is attached directly to the vertical uprights to keep it more firmly in place.

Secondly, the improved base is made of a 16 gauge or heavier steel to resist damage better.

Thirdly, the bent-over flange has been removed from the side of the shelving unit, reducing damage in shipment.

The location of anchor bolt holes closer to the front and back of the shelving unit increases the moment arm and provides greater resistance to overturning of the shelving unit. Also, the holes are able to be mounted directly to the improved base of the invention which is made of heavier gauge steel and thus provides improved supporting. Furthermore, since with the improved base the mounting holes are away from the side panels it is easier to access those mounting holes during mounting of the shelving unit to the floor.

The improved base is of a stronger material, is shaped in a U-shape, and provides more resistance to overturning of the shelving unit.

Assembly is easier than the prior art kick plate system because two parts (kick plate and shelf support) are being replaced by one part—the improved base.

Most importantly, because of the improved structure of the base, it is far less likely to be bent when people or objects accidentally hit the front of the base.

BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 is a side partial view showing the prior art shelving unit with a prior art kick plate;

FIG. 2A and FIG. 2B are respectively a rear view and an end view of the prior art shelf support shown in FIG. 1;

FIG. 3 is a side cross-sectional fragmentary view taken along line III—III of FIG. 4 of the improved base system for a shelving unit according to the invention;

FIG. 4 is a fragmentary perspective view of a bottom of the shelving unit according to the present invention showing the improved base system;

FIG. 5 is the same fragmentary perspective view of FIG. 4 but with the bottom shelf removed;

6,105,513

3

FIG. 6 is a top view of the improved base of the present invention;

FIG. 7 is a front view of the improved base of the invention; and

FIG. 8 is a top view taken along line VIII—VIII of FIG. 4 showing a plan view of the improved base system of the present invention.

DESCRIPTION OF THE PREFERRED EMBODIMENTS

Referring to FIGS. 3, 4 and 5, the improved base method and system of the present invention for a shelving unit 100 is illustrated. A base 30 preferably formed of at least 16 gauge or heavier steel having a U-shape with a short rear vertical wall 34 and a long vertical wall 32 is joined at the bottom by a base 33. The base or floor portion 33 of the base 30 rests on the floor 19. It has mounting apertures 44 and 45 (see FIG. 6) for receiving the respective mounting bolts 5.

The base 30 engages with respective vertical posts 12 with four projecting rivets 42, 43, 35, and 36 each having a projecting head portion as shown in FIG. 7 most clearly. These projecting rivets are received in respective keyhole-shaped slots 13 of the posts 12.

As shown in FIG. 3, the side wall 28 at the bottom of the overall shelving system does not have a flange as in the prior art. The side panel 28 is mounted between doubled walls of the vertical posts 12 as shown in FIG. 8.

The improved shelving unit 7 of the invention has its bottom shelf 25 with a lip 25A overhanging the front tall vertical wall 32 of the base 30. If desired, an additional reinforcement channel 37 may be provided having a cutout 37A for receiving the top end of the short rear vertical wall 34 of the base 30. The reinforcement channel 37 has a front edge 37B butting up against the inner side of the taller front vertical wall 32 of the base 30. The reinforcement channel 37 has side walls 37C and an upper roof portion 37D on which the shelf 25 rests.

The back end of the shelving unit 7 may have a similar base such as 30, or alternatively may employ the shelf support of the prior art design such as shown in FIGS. 2A and 2B.

As shown in FIGS. 6 and 7, the short rear wall 34 has a shorter length than the floor portion 33 since horizontal cuts 46 and 53 are provided. This provides clearance for mounting the base since where the holes 44 and 45 are located in the floor portion 33 of the base that area is spaced from the side walls 28 of the shelving unit. Also, a slanting transition cuts 47 and 48 are provided from the floor portion 33 to the tall front wall 32.

FIG. 8 shows the mounting holes 44 and 45 and additional mounting holes 49 and 50 if an additional improved base 51 is employed at the backside of the shelving unit 7 in lieu of the shelf support. As can be seen in this view, the mounting holes 44 and 45 are close to the front wall 32 of the base 30 so as to provide overall strength to the unit.

As can be seen according to the present invention, the improved base 30 is a combination of the prior art kick plate 15 and channel 16, and therefore replaces two parts by one.

Although various minor modifications might be suggested by those skilled in the art, it should be understood that I wish to embody within the scope of the patent warranted hereon all such modifications as reasonably and properly come within the scope of my contribution to the art.

4

I claim as my invention:

1. A shelving unit, comprising:

four vertical posts arranged at corners of a rectangle with two of the posts being at a front of the shelving unit; a plurality of shelves vertically spaced from one another and supported by the four posts;

at the front of the shelving unit, a channel-shaped base having a front vertical wall, a base portion, and a rear vertical wall, and resting on a floor on which the shelving unit rests, said base being attached to the front two posts at ends of the base by projecting head rivets having head portions mounted to the front vertical wall of the base and received in keyhole-shaped slots in the front two posts;

at least one aperture in the base portion of the base for receiving a mounting bolt to be anchored to the floor; a bottom shelf having its front end resting on an upper edge of said front vertical wall of the base; and a rear of the bottom shelf being supported by a shelf holding element attached to the two posts at the rear of the shelving unit.

2. The shelving unit according to claim 1 wherein the bottom shelf has a front lip overhanging the upper edge of the base front vertical wall.

3. The shelving unit according to claim 1 wherein the base rear vertical wall is shorter than a height of the front vertical wall.

4. The shelving unit according to claim 1 wherein the base portion of the base has two apertures for mounting bolts spaced apart near ends of the base.

5. The shelving unit according to claim 1 wherein the front vertical wall of the base has at each end two vertically arranged projecting rivets each having a head portion.

6. The shelving unit according to claim 1 wherein below the head rivets the ends of the front vertical wall of the base slant inwardly to the base portion and wherein at the rear vertical wall of the base ends of the rear vertical wall are spaced inwardly of ends of the base portion of the base.

7. The shelving unit according to claim 1 wherein the shelf holding element at the rear of the bottom shelf comprises another base identical to the base at the front of the shelving unit.

8. The shelving unit according to claim 1 wherein the shelf holding element at the rear of the bottom shelf comprises a shelf support attached to the two rear posts of the shelving unit.

9. The shelving unit according to claim 8 wherein the shelf support is U-shaped and has at ends thereof at least one projecting head rivet with a respective head portion receivable in respective tear-shaped slots in the rear posts.

10. The shelving unit according to claim 1 wherein at least one inverted U-shaped reinforcement channel runs from the front of the bottom shelf to the rear of the bottom shelf and rests at the front on an upper edge of the rear vertical wall of the base.

11. The shelving unit according to claim 10 wherein the reinforcement channel has a cutout for receiving said top edge of the rear vertical wall of the base.

12. The shelving unit according to claim 11 wherein the reinforcement channel in addition to said cut-out also has an additional cut-out as a clearance for a vertical wall of a U-shaped shelf support at the rear of the shelf so as to allow the rear of the reinforcement channel to be supported by a base portion of the U-shaped shelf support provided at a rear end of the bottom shelf.

13. The shelving unit according to claim 10 wherein a front end of the reinforcement channel abuts against an upper portion of said front vertical wall of the base.

6,105,513

5

14. The shelving unit according to claim 1 wherein the base is constructed of at least 16 gauge or heavier steel.

15. The shelving unit according to claim 1 wherein outer front ends of the front vertical wall of the base abut against an inner wall having said keyhole-shaped slots of the front two posts. 5

16. The shelving unit according to claim 1 wherein the four posts each have a front portion forming a rectangular channel having keyhole-shaped slots on an inner surface thereof and also a side flange. 10

17. The shelving unit according to claim 1 wherein the shelving unit has side panels without a flange at the bottom so that on a bottom edge of the side panels rest directly on the floor.

18. The shelving unit according to claim 1 wherein the side panels are received in sandwich fashion between two metal layers of a side flange of the vertical corner posts. 15

19. A shelving unit, comprising:

four vertical posts arranged at corners of a rectangle with two of the posts being at a front of the shelving unit; at the front of the shelving unit, a channel-shaped base having a front vertical wall, a base portion, and a rear vertical wall, and resting on a floor on which the shelving unit rests, said base being attached to the front two posts at ends of the base by connecting elements mounted to a front vertical wall of the base and received in apertures in the front two posts; 20

at least one aperture in a base portion of the base for receiving a mounting bolt to be anchored to the floor; a bottom shelf having its front end resting on an upper edge of said front vertical wall of the base; and 25

a rear of the bottom shelf being supported by a shelf holding element attached to the two posts at the rear of the shelving unit. 30

20. A method for supporting a shelving unit on a floor, comprising the steps of:

providing corner vertical posts at corners of a rectangle;

6

providing a base having projecting mounting elements and mounting said base to two of said corner posts by placing the mounting elements in apertures in the corner posts so that after the base is in position a floor portion of the base having at least one mounting hole rests on the floor supporting the shelving unit;

providing the base as a U-shape having said front vertical wall, said floor portion, and a rear vertical wall, shorter than the front vertical wall;

placing a shelf holding element in connected position at two rear posts of the shelving unit;

placing a bolt through the mounting hole in the floor portion into the floor to mount the base of the shelving unit to the floor; and

placing a bottom shelf so that a front of the shelf rests on an upper edge of a front vertical wall of the base and with a rear of the shelf resting on the shelf holding element at the rear posts. 15

21. The method according to claim 20 including the step of providing the rear shelf support as an identical base as the base at the front of the shelving unit and mounting the identical base to the rear posts in a same fashion as the front base is mounted to the front posts. 20

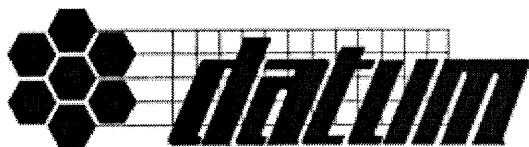
22. The method according to claim 20 wherein the rear shelf holding element comprises a U-shaped shelf support spaced from the floor when it is mounted to the rear posts. 25

23. The method according to claim 20 including the step of providing the projecting mounting elements as head rivets having heads and placing heads of the head rivets into keyhole-shaped slots in the corner posts when mounting the base to the front two corner posts. 30

24. The method according to claim 20 including the step of placing a reinforcement channel so that a front of the reinforcement channel rests on the shorter rear vertical wall of the base prior to placement of the bottom shelf onto the upper edge of the front vertical wall. 35

* * * * *

EXHIBIT 2

[HOME](#) [HOW TO BUY](#) [REQUEST INFO](#) [CUSTOMER SERVICE](#) [DEALER SUPPORT](#) [DATUM](#) [CONTACT](#)[PRODUCTS BY NAME](#)
[PRODUCTS BY GROUP](#)
[PRODUCTS BY MARKET](#)[FOR BUSINESSES](#)
[FOR DEALERS](#)
[FOR A&D](#)[CASE STUDIES](#)
[GOVERNMENT SALES](#)[PRINT PAGE](#)
[EMAIL PAGE](#)
[BOOKMARK PAGE](#)

4Post™

[MOBILE EXPANSION](#)
[DOWNLOAD LITERATURE](#)
[HOW TO BUY](#)

WHAT'S IN STORE?

Sign up for the Datum Newsletter "What's In Store?" and stay in the know.

[Click here to sign up](#)

4Post™

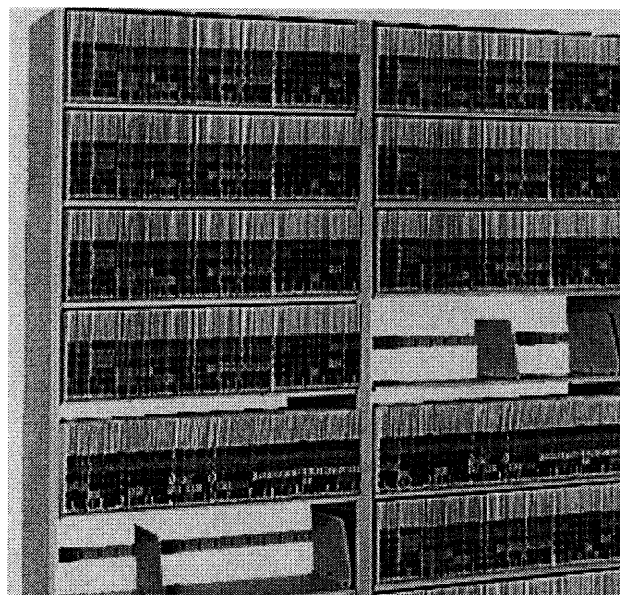
Think your storage needs are too difficult? Datum 4Post™ Shelving gives you the ability to create a uniquely customized storage system by incorporating both "L" and "T" shaped uprights. Weight isn't an issue, thanks to double rivet shelf supports and optional shelf reinforcement.

Key Features

Versatility: 4Post™ allows for the storage of a variety of media, even within a single unit. Quickly change the height of shelf openings with adjustable shelf supports.

Customization: Create a system to meet your unique storage requirements with a variety of 4Post™ accessories. From magazine displays to garment racks, 4Post™ Systems are as unique as your needs!

Expansion Available: Combine 4Post™ shelving with a TrakSlider™ or MobileTrak5® System to make the most of your available space.



4POST 2" HIGH COMBO BASE INSTRUCTIONS

STEP 1: Place the Combo Base between the uprights (see *Figure A*). Insert the rivets into the bottom two keyholes on the uprights (see *Figure B*). Use a rubber mallet to tap the Combo Base down tightly into the keyholes. Repeat for rear Combo Base if installing a Double Entry unit.

Figure B

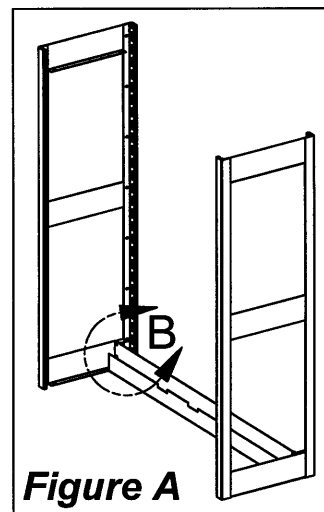
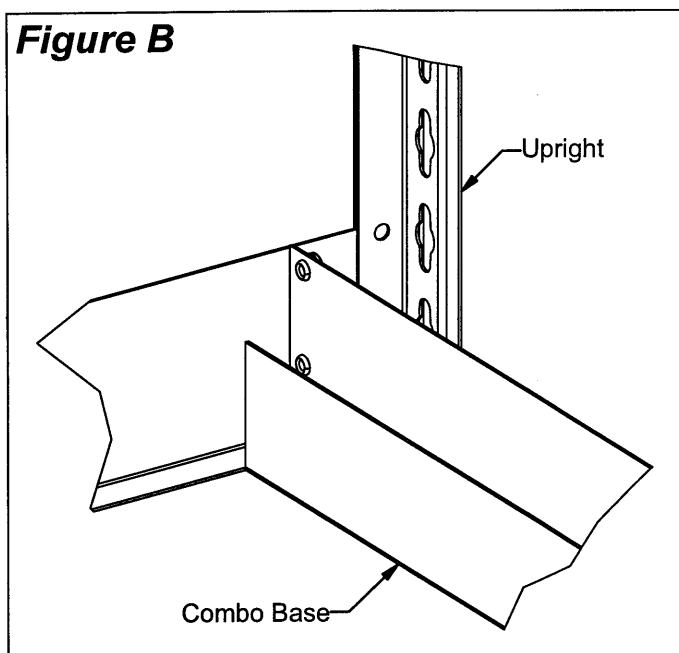


Figure A

STEP 2: For Single Entry units, place a shelf reinforcement between the Combo Base & Shelf Support as shown in *Figure C*. For Double Entry units, place a shelf reinforcement bracket between the Combo Bases as shown in *Figure D*.

Single Entry

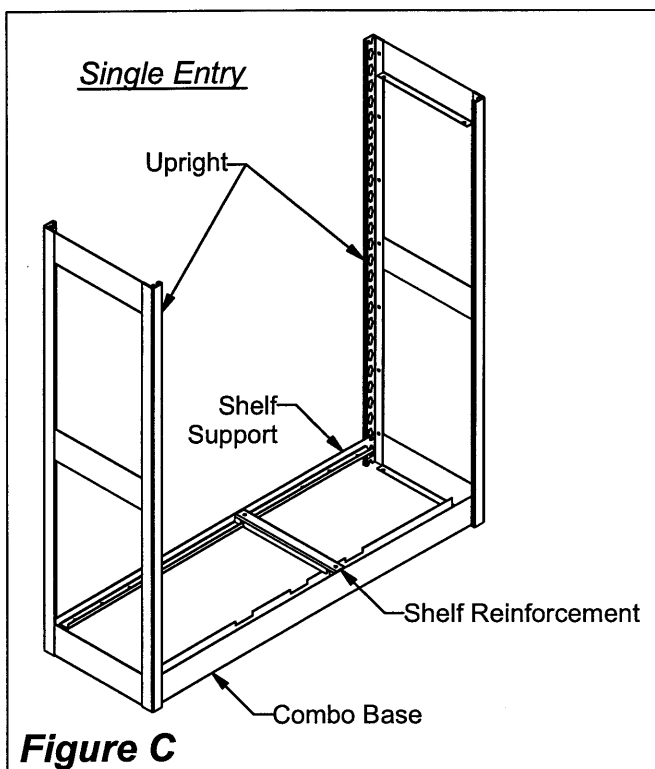


Figure C

Double Entry

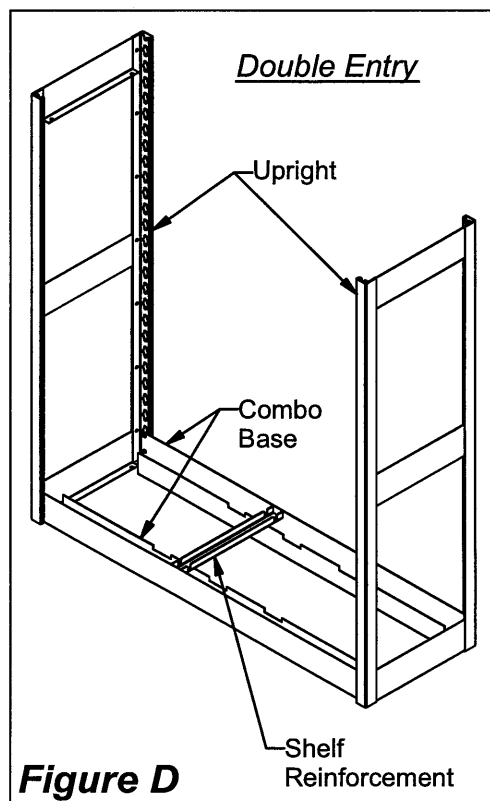
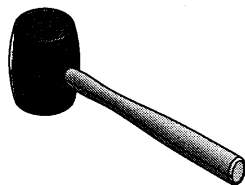


Figure D

For assembly assistance, please call
1-866-217-0330.

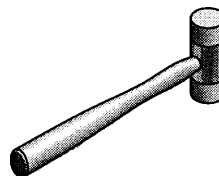
4POST ASSEMBLY INSTRUCTIONS

TOOLS REQUIRED FOR ASSEMBLY



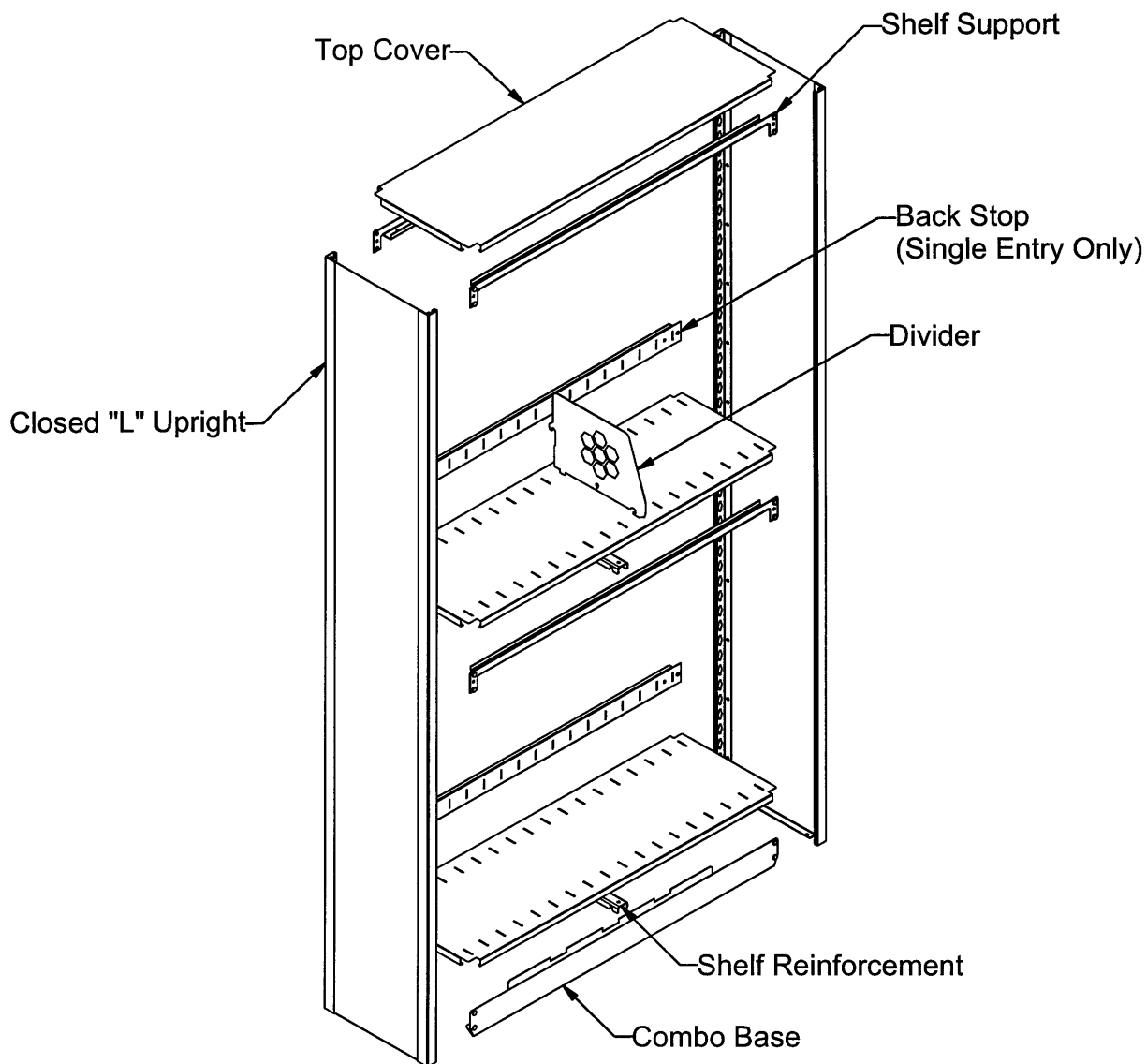
Rubber Mallet

OR



Plastic Tip Hammer

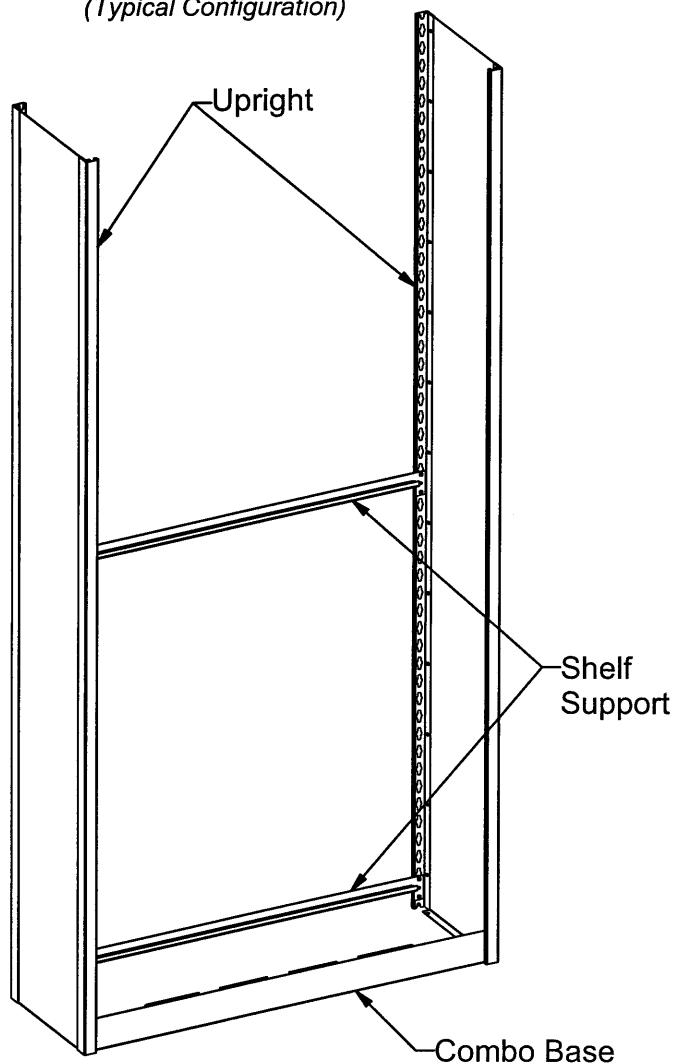
PARTS REQUIRED FOR ASSEMBLY OF SINGLE ENTRY STARTER



4POST ASSEMBLY INSTRUCTIONS

2" Combo Base (Typical Configuration)

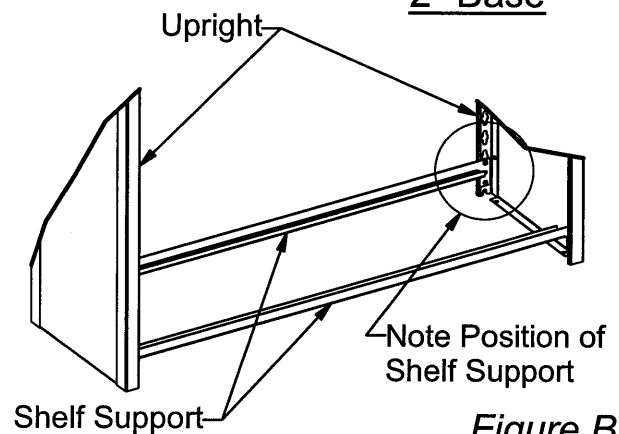
Figure A



Step 1: Temporarily mount a Shelf Support at chest height to hold Uprights in position (*Figure A*). Rivets of Shelf Support fit into keyholes on Uprights. Use a Rubber Mallet or Plastic Tip Hammer to tap Shelf Support into bottom of keyholes.

Step 2: Depending on configuration ordered, bottom components will be assembled in one of four ways as shown below. Refer to *Figures A, B, C & D*.

2" Base



4" Base

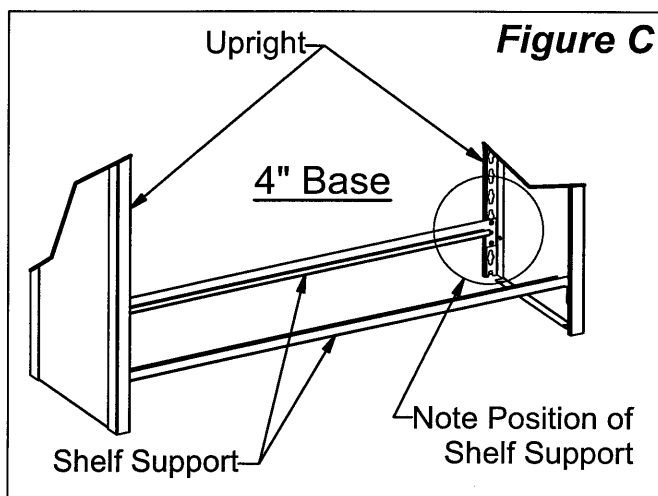
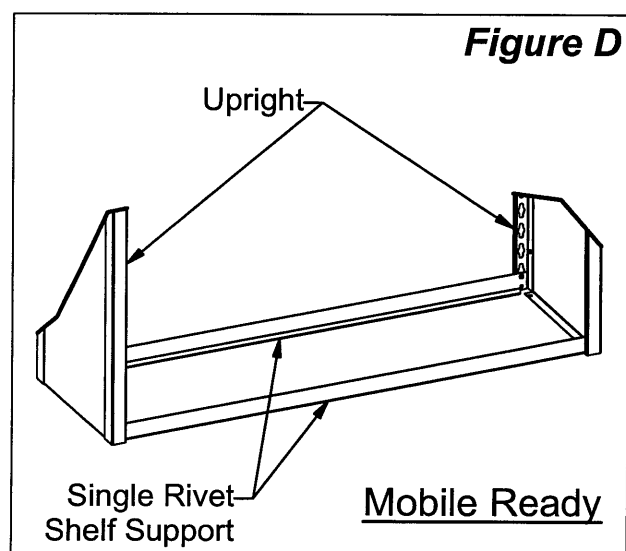
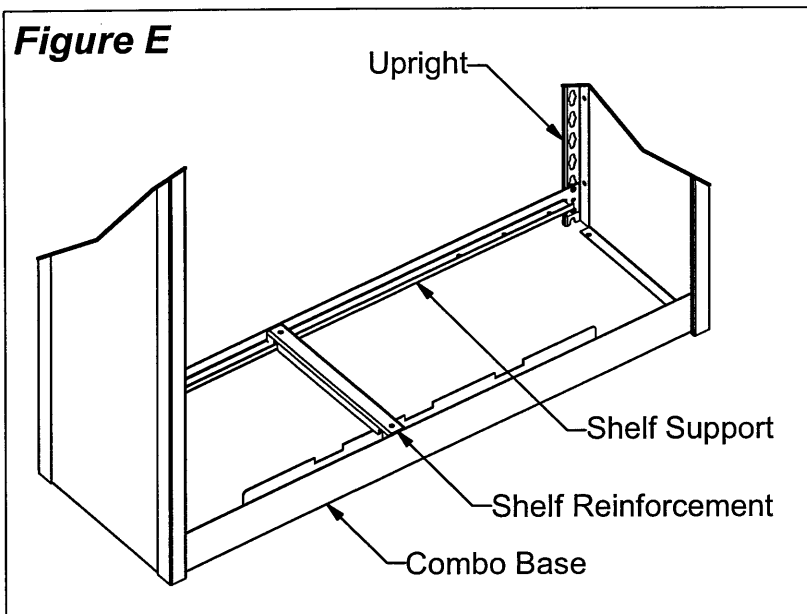


Figure D



4POST ASSEMBLY INSTRUCTIONS

Figure E



Step 3: If required (see **Table 1**), install Shelf Reinforcement(s) as shown in *Figure E*.

TABLE 1 TYPICAL SHELF REINFORCEMENT CHART	
Depth of Shelving	No. of Shelf Reinforcements
12"	None
15"	None
18"	Two

Step 4: Install Shelf by tilting as shown in *Figure F*. It should then lay flat on Combo Base & Shelf Support.

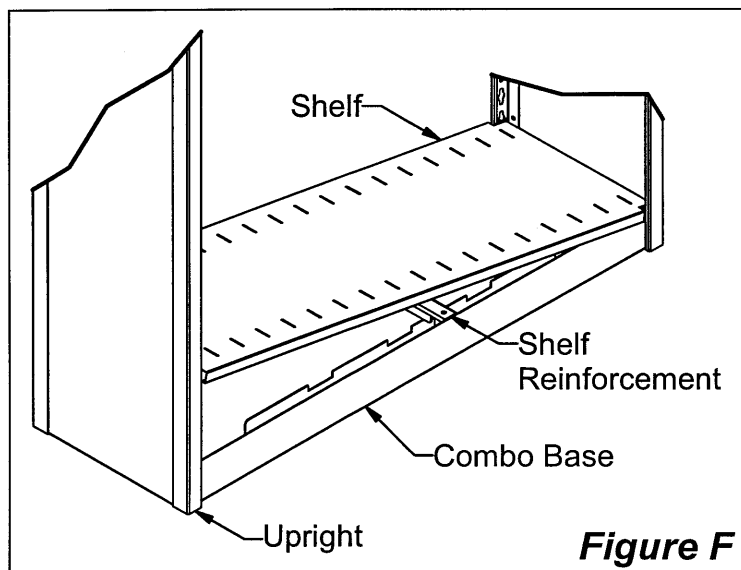
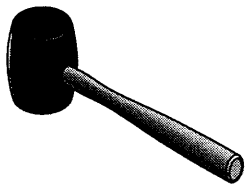


Figure F

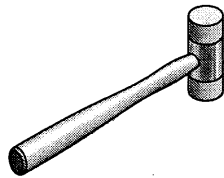
4POST ASSEMBLY INSTRUCTIONS

TOOLS REQUIRED FOR ASSEMBLY

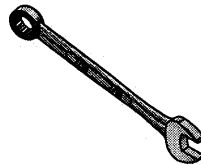


Rubber Mallet

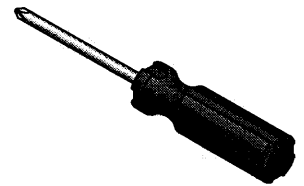
OR



Plastic Tip Hammer

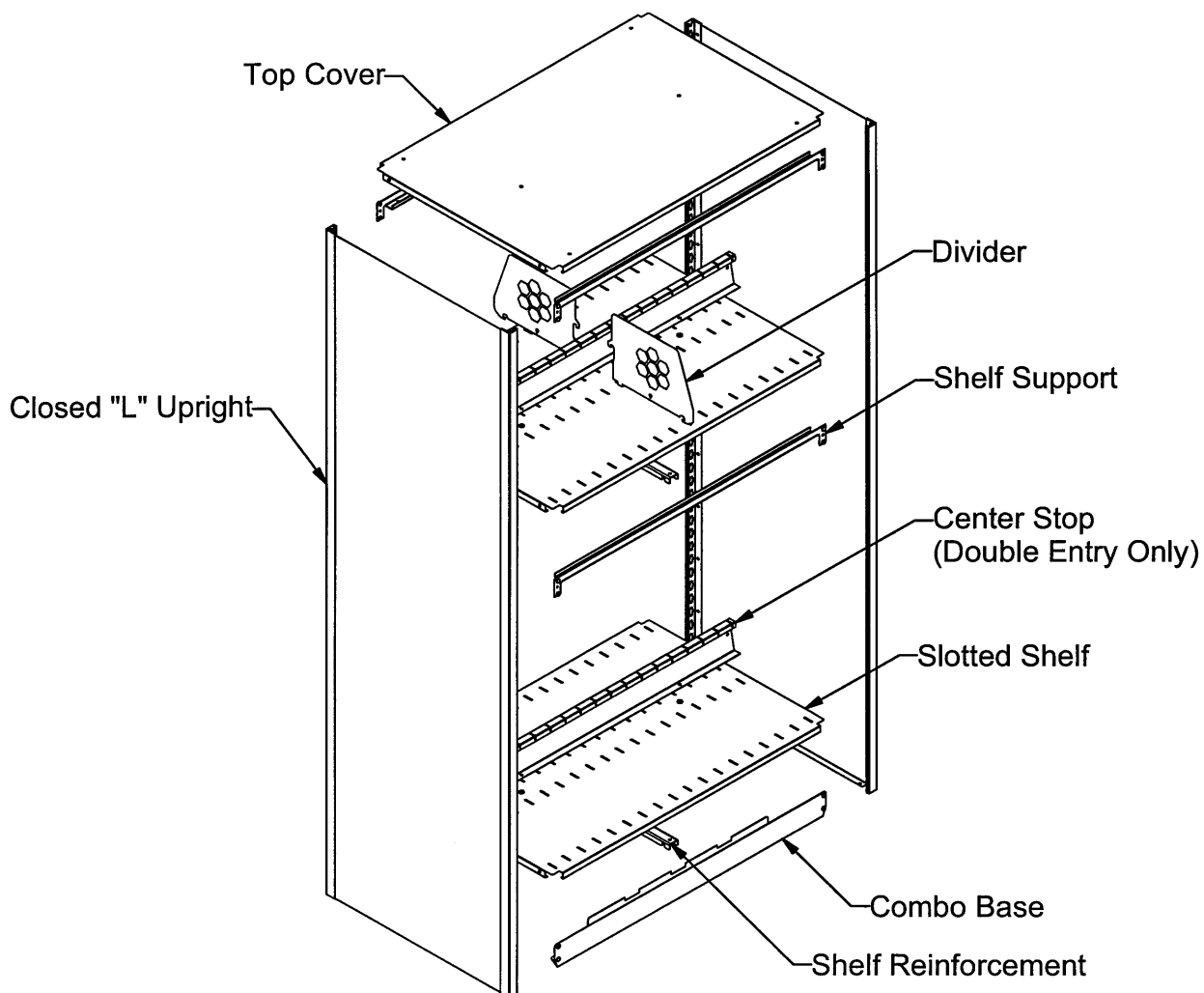


7/16" Wrench



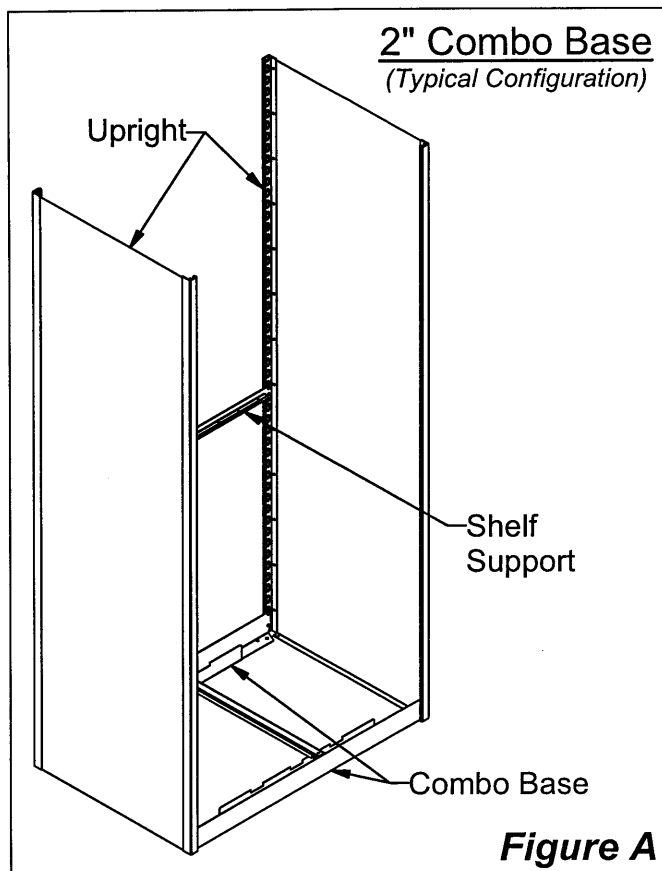
Phillips Screwdriver

PARTS REQUIRED FOR ASSEMBLY OF DOUBLE ENTRY STARTER



4POST ASSEMBLY INSTRUCTIONS

2" Combo Base (Typical Configuration)



Step 1: Temporarily mount a Shelf Support at chest height to hold Uprights in position (*Figure A*). Rivets of Shelf Support fit into keyholes on Uprights. Use a Rubber Mallet or Plastic Tip Hammer to tap Shelf Support into bottom of keyholes.

Step 2: Depending on configuration ordered, bottom components will be assembled in one of four ways below. Refer to *Figures A, B, C & D*.

2" Base

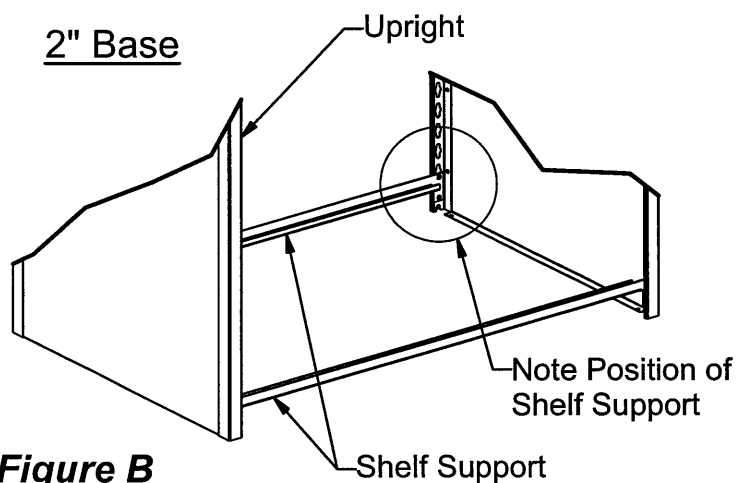
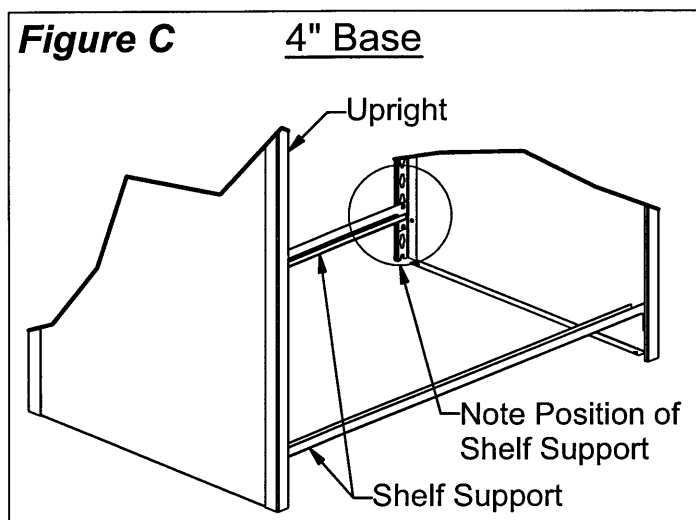
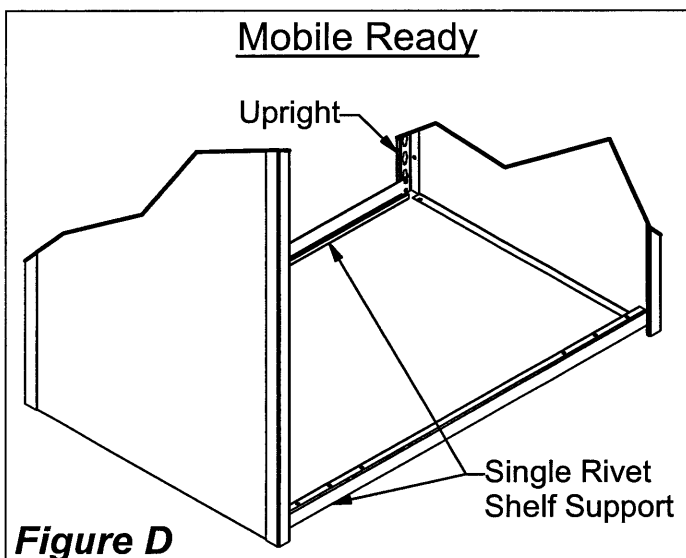


Figure C

4" Base

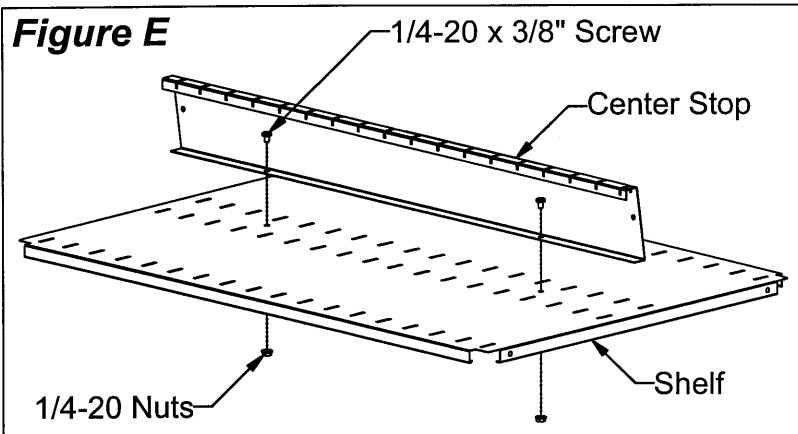


Mobile Ready



4POST ASSEMBLY INSTRUCTIONS

Figure E



Step 3: Before mounting Shelves into Double Entry Shelving, Center Stops need to be attached to Slotted Shelves using 1/4-20 x 3/8" Phillips Pan Head Machine Screws & Flanged Nuts as shown in *Figure E*.

1/4-20 x 3/8" Phillips Pan Head Machine Screw



1/4-20 Flanged Hex Nut

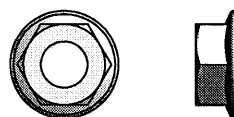
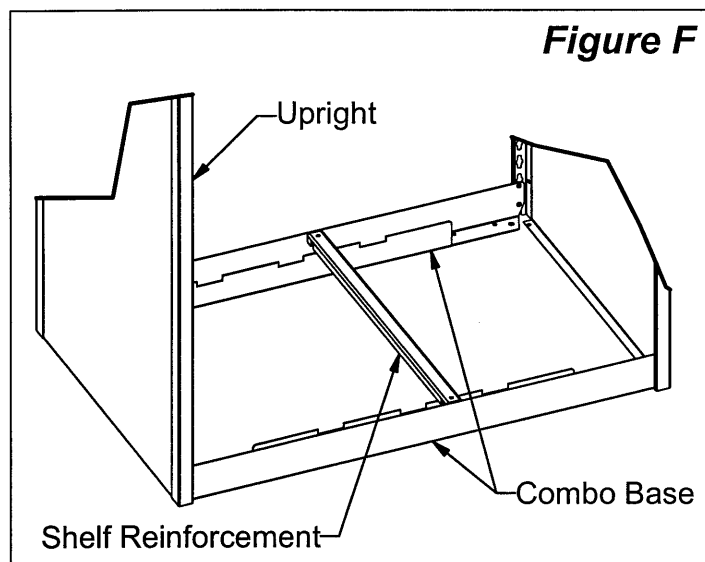


Figure F



Step 4: Install Shelf Reinforcement(s) as shown in *Figure F*. Use **Table 1** to decide how many Shelf Reinforcements are needed.

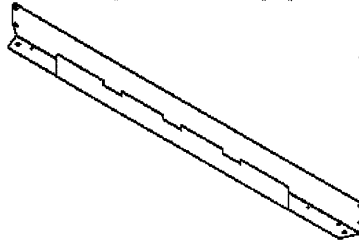
TABLE 1
TYPICAL SHELF REINFORCEMENT CHART

Depth of Shelving	No. of Reinforcements per Letter or Legal Shelf	Depth of Shelving	No. of Reinforcements per X-Ray Shelf
24"	One	Up to 36"	Two
30"	Two	42"	Three
36"	Two	48"	Four

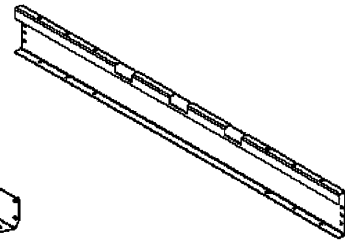
Combo Base

ITEM #	DESCRIPTION	EST. LBS.	ZONE I	ZONE II
QB2402	24" wide 2" high each	3	7.90	8.70
QB2404	24" wide 4" high each	5	9.60	10.60
QB3002	30" wide 2" high each	4	8.30	9.10
QB3004	30" wide 4" high each	6	9.90	10.90
QB3602	36" wide 2" high each	5	8.70	9.60
QB3604	36" wide 4" high each	7	10.30	11.30
QB4202	42" wide 2" high each	6	11.40	12.50
QB4204	42" wide 4" high each	8	13.20	14.50
QB4802	48" wide 2" high each	7	12.90	14.20
QB4804	48" wide 4" high each	9	14.80	16.30

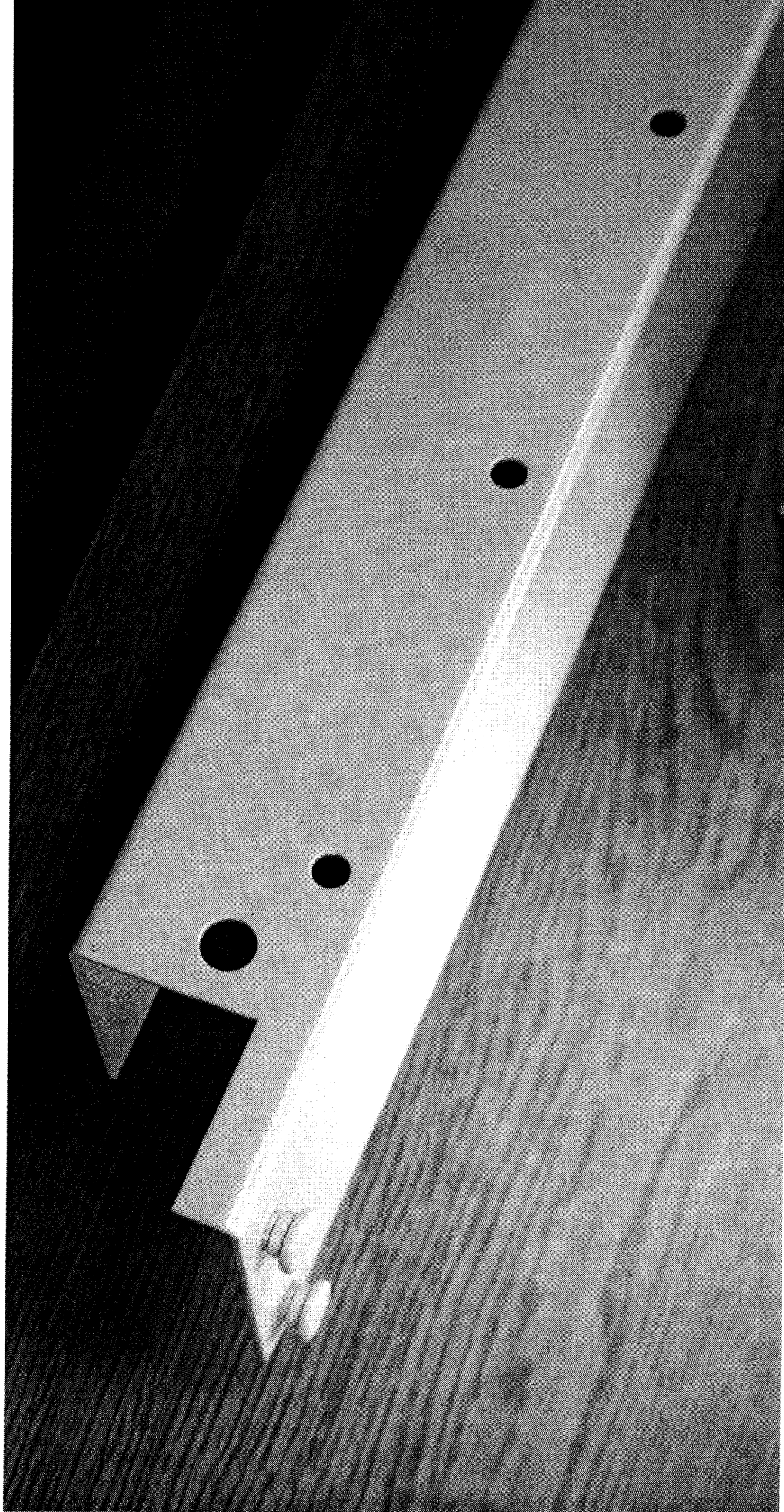
2" High Combo Base, 16 gauge



4" High Combo Base, 14 gauge



Replaces (1) Shelf Support on all Single Entry, and (2) Shelf Supports for all Double Entry Preconfigured Shelving. Specify Shelf Reinforcements as required. The Combo Base is compatible with all 4Post™ shelves.



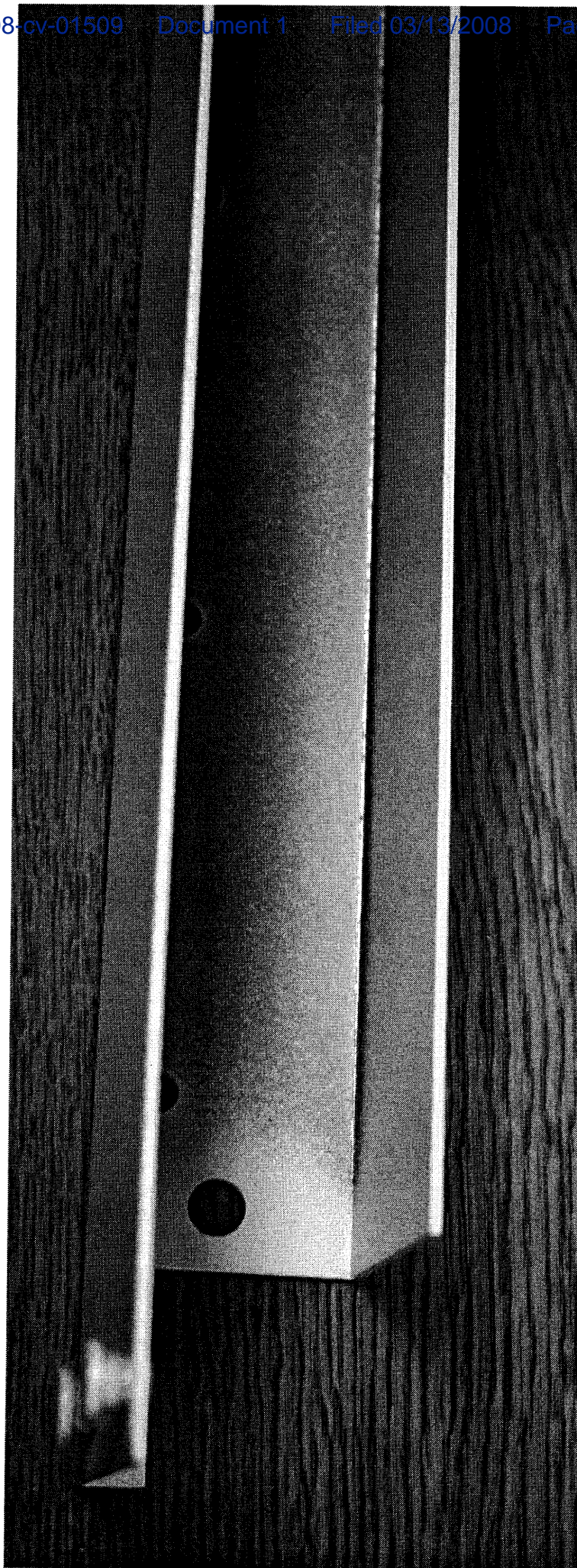


EXHIBIT 3



6600 SEARS TOWER
CHICAGO, ILLINOIS 60606
t 312.258.5500
f 312.258.5600
www.schiffhardin.com

Brett A. Valiquet
(312) 258-5786
Email: bvaliquet@schiffhardin.com

March 13, 2008

VIA FEDERAL EXPRESS and FACSIMILE

Mr. Thomas Potter
President
Datum Filing Systems, Inc.
89 Church Road
Emigsville, Pennsylvania 17318-0355

Re: Richards-Wilcox, Inc. v. Datum Filing Systems, Inc. – Our Matter 27085-0154

Dear Mr. Potter:

We are Intellectual Property Counsel for Richards-Wilcox, Inc. of Aurora, Illinois (hereinafter "Richards-Wilcox")

Richards-Wilcox is the owner of U.S. Patent 6,105,513 titled: "SHELVING BASE METHOD AND SYSTEM", issued August 22, 2000 (hereinafter the "'513 patent"). Richards-Wilcox manufactures and sells in the United States Four Post Shelving with Quik-Base™ covered by one or more patent claims of the '513 patent (attached Exhibit 1).

Richards-Wilcox has recently learned that Datum Filing Systems, Inc. (hereinafter "Datum") makes or has made, offers for sale, and sells in the United States Four Post Shelving with 2" Combo Base (hereinafter "Four Post Shelving with 2" Combo Base").

The Datum Four Post Shelving with 2" Combo Base infringes one or more claims of the '513 patent.

You are instructed to immediately cease and desist from any further infringement of the '513 patent, and confirm with the undersigned.



Mr. Thomas Potter
March 13, 2008
Page 2

Please be aware that we are filing today in the United States District Court for the Northern District of Illinois a Complaint for Patent Infringement. We enclose a courtesy copy of the Complaint, which we do not intend to serve upon you immediately, in the hope that we may use this time to discuss and arrive at an amicable solution which will obviate the need for litigation. If I do not hear from you sooner, I will telephone within a week to see whether we may pursue these possibilities.

Sincerely,

A handwritten signature in black ink that reads "Brett A. Valiquet". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

Brett A. Valiquet

BAV/cb